

Exhibit “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

HUGO MEDELLIN

VS.

**ARION MORSHEDIAN AND
SPACE EXPLORATION TECHNOLOGIES CORP.**

CIVIL ACTION NO. 1:22-CV-00084

WAIVER OF NOTICE

Our client, **Michelle D. Pector**, has commissioned Republic Services San Antonio LLC to obtain records on cell phone number **(956) 312-2340** from the following custodian for use in the above referenced case.

IF COPIES ARE DESIRED, PLEASE INDICATE BELOW BY MARKING Y OR N. Original records will be held inhouse for 30 days. Copies may not be available after that time.

I CRICKET COMMUNICATIONS, INC. (Phone Records)

I agree that I and/or my firm will be responsible for payment of the copies of records ordered on this waiver. I acknowledge that invoices are due and payable within 30 days of receipt and that actions for collection of services are performable and payable in County, Texas.

I DO AGREE TO WAIVE THE NOTICE PERIOD.

I DO NOT AGREE TO WAIVE THE NOTICE PERIOD.

Dated: September 27, 2022

Signed

**Mario A. Cisneros
Begum Law Group, LLC
2401 Wildflower Dr., Ste. B
Brownsville, TX 78526
956-982-1800 Fax 956-982-8602
Attorney for Plaintiff
SBA #**

Please Return To: **Republic Services San Antonio LLC
12108 Radium Street
San Antonio, TX 78216
210-298-6300 Fax 210-298-6303
Christina Escamilla (cescamilla@republic-services.com)**

NOTE: RETURN OF THIS FORM IS REQUIRED WITHIN FOURTEEN (14) DAYS TO PROCESS YOUR REQUEST. ANY CANCELLATION OF THE ABOVE MUST BE IN WRITING. IF THE RECORDS HAVE ALREADY BEEN COPIED AND FEES INCURRED, THEN BILLING WILL BE PRORATED ACCORDINGLY.

Order No. 97266

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**NOTICE OF INTENTION
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Plaintiff by and through their attorney(s) of record: **Mario A. Cisneros (Begum Law Group, LLC)**
To other party/parties by and through their attorney(s) of record: **Celia A. Guerra (Brock Guerra Strandmo Dimaline Jones, P.C.) and David G. Oliveira (Roerig, Oliveira & Fisher, L.L.P.)**

You will please take notice that fourteen (14) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:
CRICKET COMMUNICATIONS, INC. (Phone Records)
208 SOUTH AKARD STREET, 10TH FLOOR, M
DALLAS, TX 75202

before a Notary Public for **Republic Services San Antonio LLC, 12108 Radium Street, San Antonio, TX 78216,**
210-298-6300 Fax 210-298-6303

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 45, Federal Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

cell phone number (956) 312-2340

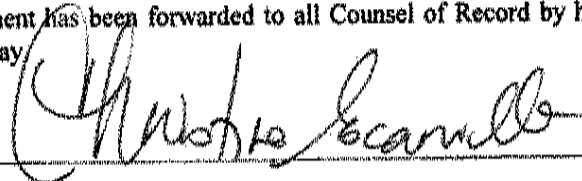
and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

/s/ Michelle D. Pector
Michelle D. Pector
Morgan, Lewis & Bockius, LLP
1000 Louisiana, Suite 4000
Houston, TX 77002
713-890-5000 Fax 713-890-5001
Attorney for Defendant
SBA # 24027726

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day

Dated: September 27, 2022

by



97266

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DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **CRICKET COMMUNICATIONS, INC.**

Records Pertaining To: **cell phone number (956) 312-2340**

Type of Records: **Any and all records from 06/10/2021 ~ 06/12/2021 "Central Time Zone" regarding (956) 312-2340, including but not limited to, the subscriber, information reflecting incoming and outgoing phone calls, duration of such phone calls, incoming and outgoing text messages, data usage, cell tower location, and anything else that is reduced to writing in the possession, custody or control of the said witness. Please also provide a written statement of your data retention policy or e-discovery compliance rules.**

1. State your full name, address and occupation.

Answer: _____

2. Are you able to identify these records as the originals or true and correct copies of the originals?

Answer: _____

3. Were these records made and kept in the regular course of business?

Answer: _____

4. In the regular course of business, did the person who signed or otherwise prepared these records either have personal knowledge of the entries on these records or obtain the information from sources who have such personal knowledge to make such records?

Answer: _____

5. Are these records under your care, supervision, directions, custody or control?

Answer: _____

6. Are these records made at a time closely related to or simultaneous with the occurrence recorded on these records?

Answer: _____

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7. Were these records kept as described in the previous questions?

Answer: _____

8. Please gather any and all of such records together and deliver same to the officer taking your deposition for inspection and photocopying. (This will be at no expense to you, and the officer will return the original records to you after they have been both inspected and copied.) Have you done as requested? If not, why not?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20_____.

NOTARY PUBLIC

My Commission Expires: _____

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